

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Students for Life of America, *et al.*,

Plaintiffs,

v.

Ann Gillespie, Acting Director of the Illinois
Department of Insurance

Defendant.

Case No. 1:24-cv-11928

District Judge Jeffrey I. Cummings
Magistrate Judge Beth W. Jantz

**DEFENDANT’S MOTION FOR LEAVE TO FILE A
NOTICE OF SUPPLEMENTAL AUTHORITY**

Defendant Acting Director of the Illinois Department of Insurance Ann Gillespie, by her attorney, the Illinois Attorney General, respectfully seeks leave to file a notice of supplemental authority to permit consideration of *Medina v. Planned Parenthood South Atlantic*, No. 23-1275, 606 U.S. ____ (June 26, 2025), in support of her Motion to Dismiss Plaintiffs’ Second Amended Complaint. (Dkt. 25.) *Medina* affirms Defendant’s arguments that Plaintiffs cannot use Section 1983 to enforce the Coats-Snowe and Weldon Amendments. The Amendments are spending-clause statutes that do not contain an unambiguous intent to confer individual rights onto any of the Plaintiffs. (*See* Dkt. 26 at 25-26; Dkt. 35 at 16-19.)¹

Defendant now seeks leave to supplement her motion to dismiss briefing with *Medina*. As *Medina* was not released until thirteen days after briefing concluded, she was unable to include it with her arguments. Defendant sought to swiftly apprise this Court of *Medina* once the opinion issued.

¹ “Dkt. at ____” refers to the docket and page number generated by the ECF system.

Defendant's proposed Notice of Supplemental Authority is attached as Exhibit A. The *Medina* decision is attached at Exhibit A-1.

Dated: June 30, 2025

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

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